

Exhibit 2

April 16, 2018

Brett Lyman

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

* * *

MARTIN CROWSON,

)

)

Plaintiff,

)

Case No. 2:15-cv-00880

vs.

)

Deposition of:

WASHINGTON COUNTY,
et al.,

)

BRETT LYMAN

Defendants.

COPY

* * *

April 16, 2018

9:00 a.m.

WASHINGTON COUNTY TREASURER OFFICE
197 East Tabernacle Street
St. George, Utah

* * *

Linda Van Tassell
- Registered Diplomate Reporter -
Certified Realtime Reporter

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1 about Mr. Crowson here in a minute.

2 A. Okay.

3 Q. How often were the people in A block
4 observed by a correctional officer?

5 A. Well, we were required to walk through
6 the sections at least once every hour and then if we
7 had to go in there to conduct business, more than
8 once an hour. They are constantly being watched
9 from the control room. A block especially a lot of
10 times would be listened to because they're yelling,
11 communicating to each other.

12 Q. Okay. Did they go out for meals or were
13 meals brought to them?

14 A. Meals were brought to them in their
15 cells.

16 Q. Was that done by correctional officers
17 or was there separate staff that did that?

18 A. No. Correctional officers would take
19 them in.

20 Q. Was it the type of situation where it
21 was slid through the windows?

22 A. There is a cuff port on the doors that
23 is probably 4 inches by maybe 12 inches. There's a
24 lock on it. You open that up and you slide the
25 trays through that.

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1 Q. And then you receive the trays back the
2 same way?

3 A. In A block they had Styrofoam trays and
4 so when they came out they were required to clean
5 their cells. Sometime before the end of the day
6 corrections staff would go in and collect all their
7 garbage through their cuff port. We have a big
8 garbage bag and they'd throw their garbage out.

9 Q. They were Styrofoam trays?

10 A. Yeah. The white Styrofoam trays that
11 had a lid that folded over.

12 Q. Okay. So everything was disposable?

13 A. Yeah.

14 Q. Was that to avoid having a situation
15 where they would have something they could use to
16 create a weapon?

17 A. Yes.

18 Q. Were they fed different food than the
19 general population?

20 A. No. Same food.

21 Q. What was a typical menu?

22 A. Depends on the supervisor of the
23 kitchen. We had one guy out there that was buying a
24 lot of pre-prepared food. They had another guy that
25 they would cook everything. There was a lot of

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1 variety. I know at times there was probably a set
2 menu.

3 Q. Were they given fruit?

4 A. Yes.

5 Q. How often?

6 A. At least once a day with breakfast,
7 lunch or dinner. There was always fruit on one of
8 the trays.

9 Q. How were medications administered in A
10 block?

11 A. The nurses would come down and they
12 would be escorted in by an officer and then they
13 would go -- depending which inmates had medications
14 we would go from door to door to door and they would
15 be given their medications through the cuff door.,

16 Q. Okay. If an inmate was in A block,
17 would they have access to anyone other than a
18 correctional officer or a nurse?

19 A. What do you mean access?

20 Q. Was there any possibility for a person
21 who is either not a nurse or correctional officer to
22 come in contact with them?

23 A. No.

24 Q. Did the cells in A block have a toilet
25 with running water?

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1 peanut butter jar lid was cracked open and it starts
2 pushing up out through the top of the jar. It's
3 fermenting. And that's been my experience with it.

4 Q. Okay. How often would you guys discover
5 something like that?

6 A. From what I saw or knew about, which I'm
7 not there all the time, maybe two or three times a
8 month.

9 Q. Okay. How about illegal drugs in the
10 jail, is that something you guys found?

11 A. Yes. Illegal drugs were found in the
12 jail probably weekly.

13 Q. How did they get into the jail, do you
14 know?

15 A. Specifically, no. I can speculate but I
16 don't know if that's what you want.

17 Q. I don't.

18 A. Okay.

19 Q. I mean there's part of me that does,
20 I'll be honest. The illegal drugs, you say weekly.
21 What types of drugs would you guys discover in the
22 prison?

23 A. The last few years I was there a lot of
24 heroin, I guess what they call black tar heroin.
25 Just maybe four or five times the size of a wooden

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1 match head. It would be black and be wrapped up in
2 tinfoil or paper or something.

3 MR. MYLAR: Could we take a break?

4 MR. SCHRIEVER: Sure. Yeah, we can take
5 a five- or ten-minute break.

6 (Recess.)

7 Q. Mr. Lyman, I want to ask you, do you
8 remember Martin Crowson?

9 A. Yes.

10 Q. Why is it that you remember Martin?

11 A. I had a lot of interaction with him over
12 the years.

13 Q. When you say interaction, what do you
14 mean?

15 A. Just dealing with him. He seemed to
16 always bring a lot of attention on himself, talking,
17 being boisterous.

18 Q. Do you know what he looks like?

19 A. Yeah.

20 Q. How would you describe him?

21 A. Like height, weight? Medium build,
22 sometimes he could be a little husky, short hair,
23 usually had some facial hair.

24 Q. Tattoos?

25 A. Yeah.